MITCHELL D. GLINER, ESQ.
Nevada Bar #003419
3017 West Charleston Blvd., #95
Las Vegas, NV 89102
Ofc: (702) 870-8700
Fax: (702) 870-0034
Attorney for Plaintiff
mgliner@glinerlaw.com

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

TINA BAUM,)
Plaintiff,) Case No.
vs.)
EXPERIAN INFORMATION)
SOLUTIONS, INC. and TRANS UNION LLC)
Defendants.) JURY DEMANDED
	<u>`</u>

COMPLAINT

JURISDICTION

1. The jurisdiction of this Court attains pursuant to the FCRA, 15 U.S.C. Section 1681(p), and the doctrine of supplemental jurisdiction. Venue lies in the Southern Division of the Judicial District of Nevada as Plaintiff's claims arose from acts of the Defendants perpetrated therein.

PRELIMINARY STATEMENT

2. The Plaintiff brings this action for damages based upon Defendants' violations of the Fair Credit Reporting Act, 15 U.S.C § 1681 et seq. (hereinafter referred to as "FCRA"), and of state law obligations brought as supplemental claims including, but not limited to, defamation and invasion of privacy.

- 3. Plaintiff is a natural person and is a resident and citizen of the State of Nevada and of the United States. Plaintiff is a "consumer" as defined by § 1681a(c) of the FCRA.
- 4. Defendant Experian Information Solutions, Inc., ("Experian"), is a corporate entity licensed to do business in the State of Nevada.
- 5. Defendant Trans Union LLC (TUC) is a corporate entity licensed to do business in the State of Nevada.
- 6. Experian and TUC are consumer reporting agencies, as defined in § 1681(f) of the FCRA, regularly engaged in the business of assembling, evaluating, and dispersing information concerning consumers for the purpose of furnishing consumer reports, as defined in § 1681a(d) of the FCRA, to third parties.

FACTUAL ALLEGATIONS

- 7. Plaintiff's creditworthiness has been repeatedly compromised by the acts, obduracy and general indifference of Defendants.
 - 8. For years Defendants have ruined Plaintiff's credit.
 - 9. Plaintiff is a Physical Therapist with a successful private practice.
- 10. Plaintiff's credit profile was absolutely flawless prior to Defendants' erroneous reporting of her Bank of America (BOA) account.
- 11. In April, 2005 Plaintiff opened a mortgage account with BOA's predecessor in interest, Countrywide Financial.
 - 12. There was no impound account.
- 13. In April, 2009 BOA sent Plaintiff a notice to increase her payment for an ostensible impound account.
- 14. Plaintiff advised BOA she did not have an impound account and that all taxes and insurance had been separately paid over the preceding four (4) years.
- 15. After several months and numerous challenging contacts, BOA finally reversed the charges and "waived" the purported impound account.

- 16. However, in April, 2011 Plaintiff received a notice pertaining to the "negative balance" in her supposed escrow account.
 - 17. Plaintiff spoke with "Amber" who identified herself as a BOA Supervisor.
- 18. Amber explained if Plaintiff paid BOA \$791.63 she could then "opt out" of any impound account.
 - 19. Plaintiff indeed paid \$791.63 in order to put the intrusive ordeal behind her.
- 20. However, in May 2011, Plaintiff received additional delinquency notices regarding the elusive impound account.
- 21. Plaintiff contacted BOA and was funneled to numerous customer service representatives.
- 22. One representative, "Gohar," confirmed Plaintiff was never late with either any taxes or insurance payments.
- 23. Gohar explained that since Plaintiff had recently applied for a "home retention loan" an impound account was indeed required.
- 24. However, Plaintiff had never applied for a home retention loan-or, for that matter, any modification-and this was subsequently confirmed by both Gohar and Michelle.
- 25. In September, 2011 Plaintiff again contacted BOA due to daily harassing phone calls and requests for Plaintiff's late payments.
 - 26. Plaintiff was again informed her impound account was delinquent.
- 27. The constant serial calls began as early as 6:30 am and continued late into evenings.
 - 28. Plaintiff dutifully continued to pay both her taxes and insurance separately.
 - 29. About this time, BOA and Defendants ruined Plaintiff's credit.
- 30. Plaintiff made additional payments each time BOA's representatives requested them in exchange for the much promised "final waiver" of the peripatetic impound account.
- 31. On August 26, 2013 Plaintiff disputed the BOA account with Defendants (Exhibit 1).

- 32. While Exhibit 1 reflects Plaintiff's dispute to Trans Union, an identical dispute was also sent to Experian.
 - 33. The disputes detailed Plaintiff's protracted ordeal with BOA.
- 34. Plaintiff specifically advised Defendants they would be sued if they failed to correct BOA's erroneous reporting.
- 35. On September 11, 2013 TUC completed its reinvestigation "confirming" Plaintiff's "\$7,580 delinquency" (Exhibit 2).
- 36. On September 26, 2013 Experian completed its reinvestigation "confirming" Plaintiff's "\$7,580 delinquency" (Exhibit 3).
 - 37. Plaintiff's credit score dropped dramatically as a result of Defendants' reporting.
- 38. Defendants' reporting of Plaintiff's BOA account was the sole negative entry on Plaintiff's otherwise flawless credit reports.
- 39. On December 16, 2013 BOA wrote Plaintiff regarding her loan account (Exhibit 4).
 - 40. Exhibit 4 reflects a purported delinquency in excess of \$12,000.
- 41. In Exhibit 4 BOA expressed Plaintiff was "currently participating in a Trial Payment Plan" to which Plaintiff ostensibly "agreed." (Exhibit 4, pages 1 and 5).
- 42. Exhibit 4 also reflects a monthly trial payment amount of \$1,684.04 (Exhibit 4, page 1).
- 43. At no time has Plaintiff entered into any Trial Payment Plan or any other Loan Modification Agreement affecting her original 2005 mortgage.
- 44. At no time has BOA provided Plaintiff a copy of the purported Trial Payment Plan notwithstanding repeated requests to do so.
- 45. Attached as Exhibit 5 is Plaintiff's June, 2012-May, 2014 payment history on BOA's mortgage.
 - 46. Exhibit 5 reflects timely payments of \$2,154 each month.
- 47. In fact, Plaintiff had always timely paid her mortgage using her Bank's auto pay service.

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STATEMENT OF CLAIM AS AGAINST DEFENDANTS

- 63. In the entire course of their action, Defendants willfully and/or negligently violated the provisions of the FCRA in the following respects:
 - a. By willfully and/or negligently failing, in the preparation of the consumer reports concerning Plaintiff, to follow reasonable procedures to assure maximum possible accuracy of the information in the reports.
 - By willfully and/or negligently failing to comport with FCRA § 1681i.

PRAYER FOR RELIEF

THEREFORE, Plaintiff prays that the court grant the following relief against Defendants:

- a) actual damages;
- b) punitive damages;
- c) attorney's fees; and
- d) costs.

Respectfully submitted,

MITCHELL D. GLINER, ESQ.

Nevada Bar #003419

3017 W. Charleston Blvd., #95

Las Vegas, NV 89102

Attorney for Plaintiff

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August 25, 2013

CERTIFIED MAIL

TRANS UNION CORPORATION P.O. Box 2000 Chester, PA 19022

Re: TINA L. BAUM

Dear Sir:

This letter is a dispute. I attach an excerpt from my recent credit profile.

I provide my personal information: Spouse: Sean Donnelly; current address: 8705 Queens Brook Court, Las Vegas, NV 89129; SSN 25-25-25, date of birth: April 22, 1970.

Please revise the attached BOA [BAC] account to reflect a current status with no delinquencies. I purchased my home in 2005 in my name only. My agreement with BOA explicitly provided for no escrow account. All payments were timely made including all tax and insurance payments which I personally paid directly to the Assessor and my insurance company.

Notwithstanding, my problems with BOA began in 2009 when I received a notice from BOA to increase the mortgage payment for my ostensibly unfunded impound account. I called BOA advising there was no impound account and the charges were ultimately reversed with the impound account "waived." However, this protracted ordeal continued over the next four years to the present with a slew of notices and/or contacts corresponding to substantial delinquencies on my credit profiles and this status exists despite repeated confirmations from BOA that I was never late with either my mortgage payments, taxes or insurance. Simply, for some inscrutable reason, BOA keeps paying taxes and insurance which have already been paid.

You'll note that my profile is absolutely flawless but for BOA's and your misreporting. Please update my report. Respectfully, I will sue both BOA and you under the Fair Credit Reporting Act if my tradeline is not properly corrected.

Thank you in advance for your anticipated courtesy.

Veryptruly yours,

C. Baum

Enclosure

cc: Bank of America (via certified mail)

EXHIBIT I

File Number: 330135064

-Begin Credit Report-

Personal Information

You have been on our files since 05/01/1992

SSN:

XXX-XX-5724

Your SSN has been masked for your protection.

Date of Birth:

04/22/1970

Names Reported:

TINA L. BAUM

Addresses Reported:

Address Date Reported 8705 QUEENS BROOK CT, LAS VEGAS, NV 89129- 02/28/2009 2230 1290 DAKOTA AVE N, HURON, SD 57350-4547 03/28/2006 8690 QUEENS BROOK CT, LAS VEGAS, NV 89129- 10/23/2006 2229 7230 BUTTONS RIDGE DR, LAS VEGAS, NV 89131- 2320 PO BOX 10219, VAN NUYS, CA 91410-0219 01/31/2010

8690 GREENS BLOCK CT, LAS VEGAS, NV 89129

Telephone Numbers Reported:

(702) 656-5830

(702) 860-8462

(630) 515-6273

Employment Data Reported:

Employer Name Location

Location Position

Date Verified

12/17/2007

KELLY G HAWKINS LAS VEGAS, NV MEDICAL CARE WORKER 09/01/2001

SELF

Account Information

Typically, creditors report any changes made to your account information monthly. This means that some

accounts listed below may not

reflect the most recent activity until the creditor's next reporting. This information may include things such balances, payments, dates, remarks, ratings, etc. The key(s) below are provided to help you understand son the account information that could be reported.

Rating Key

Some creditors report the timeliness of your payments each month in relation to your agreement with them ratings in the key below describe the payments that may be reported by your creditors. Please note: Some t not all of these ratings may be present in your credit report.

N/R	x D D D	
Not Reported	Unknown Corrent 30 days 60 days 90 days	120+days Collection Voluntary Repo- late Collection Surrender ssession Charge Off Forects

Remarks Key

Additionally, some creditors may notate your account with comments each month. We refer to these creditors comments as 'Remarks'. The key below gives the descriptions of the abbreviated remarks contained in your credit file. Any remark containing brackets > < indicates that this remark is considered adverse.

CBC ACCOUNT CLOSED BY CLO CLOSED

CONSUMER

Adverse Accounts

Adverse information typically remains on your credit file for up to 7 years from the date of the delinquency. help you understand what is generally considered adverse, we have added >brackets< to those items in this report. For your protection, your account numbers have been partially masked, and in some cases scrambled.

BAC HOME LOANS SERV LP #9321****

4161 PIEDMONT PKWY GREENSBORO, NC 27410 (800) 451-6362

Date Opened: Date Updated: Pay Status:

04/25/2005 07/10/2013 >Account 90 Days Past Due Date<

Responsibility: Payment Terms:

Individual Account Received: \$2,526 per month, paid Monthly for 360

Account Type: \$2,526 months

Mortgage Account Last Payment >Maximum Delinquency of 120 days in

Loan CONVENTIONAL REAL ESTATE Made: 12/2012<

Type: MTG 07/05/2013

Mortgage Info:

Freddie Mac ID #100059600087806860 Acct #110843681

Estimated month and year that this item will be removed:

12/2018

Amount Due	\$2,526	\$2,526	\$2,526	\$2,526
Amount Paid	\$2,526	\$2,526	\$0	- \$0
Past Due	\$7,580	\$7,580	\$5,053	\$5,053

High Balar	nce\$359	,650	\$359	9,650	\$35	9,650\$3	59,650				
Rating	90	90	90	60	60	60	9	00	120	90	60
								0 2 12 0 2 4			
~ •			01207/2							201/20	1212/2011
Balance	\$321,				2,767\$32	경기투 하기 등이 없는데 들어보다					
Amount Di		,502		\$2	*	2,502		\$2,53			
Amount Pa		\$0		0.5	\$0	\$0	\$0	\$ 03	59		
Past Due		005			*		\$5,005	\$5,03			
High Balan			60		,650\$359				30	OTT	20
Rating	60	30	60	60	60	60	0	0	30	OK	30
	11/20	1110/20	1100/201	1100/201	1107/201	1 06/20	11 05/2	011 04	U2011	02/2011	02/2011
Dalamas	11/20	1110/20	1109/20.	1108/201	110//201						02/2011 9\$330,155
Balance Amount Du	_							-	\$2,153		
Amount Pai							\$0 \$0	\$0 \$0	\$0	\$2,133	
Past Due	lu	4					\$0	\$0	\$0	\$0	
High Balanc											\$359,650
Rating	OK	30	OK	30	OK	OK	OK	,050\$5. OK	70		OK
Rating	OK	30	OK	30	OIC	OIC	OK	OI			OK
01/20	1112/20	1011/20	1010/20	1009/20	1008/20	1007/20	1006/20	1005/2	01004/2	2010	
RatingOK	OK	OK	OK	OK	OK	OK	OK	OK	OK		
rungon	011		011	012							
03/20	1002/20	1001/20	1012/20	0911/20	0910/200	0909/200	0908/20	0907/2	00906/2	009	
RatingOK	30	30	OK	OK	OK	OK	OK	OK	OK		
05/200	0904/20	0903/200	0902/200	0901/200	0912/200	811/200	0810/20	0809/2	00808/2	800	
RatingOK	OK	OK	OK	OK	OK	OK	OK	OK	OK		
07/200	0806/200	0805/200	0804/200	0803/200	0802/200	801/200	812/20	0711/20	00710/2	007	
RatingOK	OK	OK	OK	OK	OK	OK	OK	OK	OK		
09/200		707/200								006	
RatingOK	OK	OK	OK	OK	OK	OK	OK	OK	OK		
		********	_								
		609/200	6								
RatingOK	OK	OK									

Satisfactory Accounts

The following accounts are reported with no adverse information. For your protection, your account numbers have been partially masked, and in some cases scrambled.

AMERICAN EXPRESS #349990835364****

PO BOX 981537 EL PASO, TX 79998 (800) 874-2717 *** 330135064-006 ***
P.O. Box 2000
Chester, PA 19022-2000



09/11/2013

TransUnion.

Our investigation of the dispute you recently submitted is now complete. The results are listed below, if an item you disputed is not in the list of results below, it was either not appearing in your credit file or it already reflected the corrected status at the time of investigation.

If our investigation has not resolved your dispute, you may add a 100-word statement to your report. If you provide a consumer statement that contains medical information related to service providers or medical procedures, then you expressly consent to TransUnion including this information in every credit report we issue about you. If you wish to obtain documentation or written verification concerning your accounts, please contact your creditors directly.

If there has been a change to your credit history resulting from our investigation, or if you add a consumer statement, you may request that TransUnion send an updated report to those who received your report within the last two years for employment purposes, or within the last six months for any other purpose.

If interested, you may also request a description of how the investigation was conducted along with the business name, address and telephone number of the source of information.

Thank you for helping ensure the accuracy of your credit information.

For frequently asked questions about your credit report, please visit http://transunion.com/consumerfags.

Investigation Results

 ITEM
 DESCRIPTION
 RESULTS

 BAC HOME LOANS SERV LP
 # 9321**** NEW INFORMATION BELOW

EXHIBIT 2

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Page: 1 of 1

File Number: Date Issued: 330135064 09/11/2013



-Begin Credit Report-

TransUnion.

Account Information

Typically, creditors report any changes made to your account information monthly. This means that some accounts l(sted below may not reflect the most recent activity until the creditor's next reporting. This information may include things such as balances, payments, dates, remarks, ratings, etc. The key(s) below are provided to help you understand some of the account information that could be reported.

Rating Key

Some creditors report the timeliness of your payments each month in relation to your agreement with them. The ratings in the key below describe the payments that may be reported by your creditors. Any rating that is shaded indicates that it is considered adverse. Please note: Some but not all of these ratings may be present in your credit report.

N/R X OK	30 60	90 120	COL VS	RPO C/C) FC
Not Reported Unknown Current	30 days late 60 days lat	e 90 days late late	Collection Voluntary Surrender	Repossession Charge	Off Foreclosure

Adverse Accounts

BAC HOME LOANS SERV LP #9321**** (4161 PIEDMONT PKWY, GREENSBORO, NC 27410, (800) 451-6362)

Date Opened: Responsibility: Account Type:

Loan Type:

04/25/2005

Individual Account Mortgage Account

Mortgage Account CONVENTIONAL REAL ESTATE MTG Balance: \$316,071 Date Updated: 07/31/2013

Payment Received: \$2,526 Last Payment Made: 07/05/2013 High Balance: \$359,650

Past Due: >\$7,5800

Pay Status: >Account 90 Days Past Due Dated
Terms: \$2,526 per month, paid Monthly for

360 months

Maximum Delinquency of 120 days in 11/20124

Mortgage Info: Freddie Mac ID #100059600087806860 Acct #110843681

Estimated month and year that this item will be removed: 12/2018

with the	06/2013	05/2013	04/2013	03/2013	02/2013	01/2013	12/2012	11/2012	10/2012	09/2012	08/2012	07/2012
Rating	90	90	90	60	60	60	90	120	90	60	60	30
	06/2012	05/2012	04/2012	03/2012	02/2012	01/2012	12/2011	11/2011	10/2011	09/2011	08/2011	07/2011
Rating	60	60	60	60	60	30	OK	30	OK	30.	OK	30
	06/2011	05/2011	04/2011	03/2011	02/2011	01/2011 -	12/2010	11/2010	10/2010	09/2010	08/2010	67/2016
Rating	ОК	ОК	ОК	ОК	OK	OK	OK	OK	ОК	ОК	OK	OK
	06/2010 05	/2010 04/20	010 03/2010	02/2010 01	/2010 12/20	009 11/2009	10/2009 09	/2009 08/20	009 07/2009	06/2009 05	/2009 04/20	09 03/2009
Rating	OK	OK OK	OK	30	30 OK	OK	OK	OK OK	OK	OK	OK OK	OK
	02/2009 01	/2009 12/20	008 11/2008	10/2008 09	/2008 08/20	008 07/2008	06/2008 05	/2008 04/20	08 03/2008	02/2008 01	2008 12/20	07 11/2007
Rating	OK	OK OK	OK	ОК	OK OK	OK	OK	ОК	OK	OK	OK OK	OK
	10/2007 09	/2007 08/20	07/2007	06/2007 09	/2007 04/20	07 03/2007	02/2007 01	/2007 12/20	006 11/2006	10/2006		
Rating	OK [OK OK	OK	OK	OK OK	OK	OK	OK OK	OK	OK		

- End of investigation results -

To view a free copy of your full, updated credit file, go to our website www.transunion.com/fullreport

-End of Credit Report-



Prepared for: TINA L BAUM Date: September 26, 2013 Report number: 1028-4567-64 Page 1 of 4



Dispute results

About our dispute process

This summary shows the revision(s) made to your credit file as a result of our processing of your dispute. If you still question an item, then you may want to contact the furnisher of the information directly or review the original information in the public

The federal Fair Credit Reporting Act provides that you may:

- request a description of how we processed your dispute, including the business name and address of any furnisher of information contacted in connection with such information and the telephone number if reasonably available:
- add a statement disputing the accuracy or completeness of the information; and
- request that we send these results to organizations who have requested your credit report in the past two years for employment purposes or six months for any other purpose.

If no information follows, our response appeared on the previous page.



Scan me with your smart phone for special offers from Experian. How to read your results

Deleted - This item was removed from your credit report

Remains - This item was not changed as a result of our processing of your dispute

Updated - A change was made to this item; review this report to view the change. If ownership of the Item was disputed, then it was verified as belonging to you

Processed - This item was either updated or deleted; review this report to learn its outcome

Results

We have completed the processing of your dispute(s). Here are the results:

Credit Items

Outcome

BANK OF AMERICA, N.A. 9321....

Updated

Visit experian.com/status to check the status of your pending disputes at any time

Additional information

To view a full copy of your corrected credit report, visit experian.com/viewreport

__ To receive a copy by ma check this box and within 30 days return this original page to P.O. Box 9701, Allen, TX 75013.

Copies will not be accepted.

What's your credit score? Find out by ordering your VantageScore® from Experian for only \$7.95. To order, call 1 888 322 5583.

By law, we cannot disclose certain medical information (relating to physical, mental, or behavioral health or condition). Although we do not generally collect such information, it could appear in the name of a data furnisher (i.e. "Cancer Center") that reports your payment history to us. If so, those names display on your report, but on reports to others, they display only as MEDICAL PAYMENT DATA. Consumer statements included on your report at your request that contain medical Information are disclosed to others.

PO Box 9701 Allen, TX 75013



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UEENS BROOK COURT GAS NV 89129-2230

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Prepared for: TINA L BAUM Date: September 26, 2013 Report number: 1028-4567-64 Page 2 of 4

Your accounts that may be considered negative

The most common items in this section are late payments, accounts that have been charged off or sent to collection, bankruptcies, liens, and judgments. It also may contain items that are not necessarily negative, but that a potential creditor might want to review more closely, such as an account that has been settled or transferred. This information is generally removed seven years from the initial missed payment that led to the delinquency. Missed payments and most public record items may remain on the credit report for up to seven years, except Chapters 7, 11 and 12 bankruptcies and unpaid tax liens, which may remain for up to 10 years. A paid tax lien may remain for up to seven years. Transferred accounts that have not been past due remain up to 10 years after the date the account was transferred.

Payment history legend	
Current/Terms of agreement met	VS Voluntarily surrendered
Account 30 days past due	Repossession
Account 60 days past due	Pald by creditor
Account 90 days past due	Insurance claim
Account 120 days past due	G Claim filed with government
Account 150 days past due	Defaulted on contract
Account 180 days past due	Collection
GRE Creditor received deed	Charge off
Foreclosure proceedings started	CLS Closed
Foreclosed	NP. No data for this time period

Credit items

BANK OF AMERICA, N.A. 4161 PIEDMONT PKWY GREENSBORO NC 27410 Phone number (800) 451 6362 Partial account number 9321 Address identification number 0699130137 Mortgage identification Number 100059600087806860 Freddie Mac ID 110843681	Date opened Apr 2005 First reported Sep 2006 Date of status Apr 2013	Type Mortgage Terms 30 Years Monthly payment \$2,526	Credit limit or original amount \$359,650 High balance Not reported	Recent balance \$315,495 as of Sep 2013 Recent payment \$2,526	Responsibility Individual Status Open. \$7,580 past due as of Sep 2013. By Oct 2018, this account is scheduled to go to a positive status. This item was updated from our processing of your dispute in Sep 2013.
--	---	--	---	--	---

Payment history

2013 2010
SEP AUG JUL JUN MAY APR MAR FEB JAN DEC NOV OCT SEP AUG JUL JUN MAY APR MAR FEB JAN DEC NOV DEC NOV OCT SEP AUG JUL JUN MAY APR MAR FEB JAN DEC NOV DEC NOV DEC NOV

2009 2006

MAR FEB JAN DEC NOV OCT SEP AUG JUL JUN MAY APR MAR FEB JAN DEC NOV DEC NOV

Account history - If your creditor reported your account balances to us, we list them in this section as additional information about your account. Your balance history may also include your credit limit and high balance or the original loan amount for an installment loan. This section also includes the scheduled payment amounts, amounts actually paid and the dates those payments were made. ND: No Data.

Bankof America Home Loans

Simi Valley, CA 93062-5170

0030581 62 AV 0.357 - AUTO 70 1271 89129-223005 - C27-P30611-112 MSR ADDODIOS ONT 1000000000000 BLANN-TATE - MILENVORE 2000RSTE TINA L BAUM 8705 QUEENS BROOK CT LAS VEGAS NV 89129-2230

ոնմ բլլամեների հեկայի լինանային հետական հետովարանակություն

Customer service information

En Español: 1.800,295.0025

Customer service: 1.800.669.6607

TDB/TTY users only: 1.800300.6407

Monday-Friday 7a.m. to 7p.m. Local Time

bankofamerica.com

Account number Payment due date

Total Amount Due

January 1, 2014 S12.883.7

093212003

Your Home Loan Account

Statement date: December 16, 2013X

Kou are currently participating in a Trial Payment Plan. During this Trial Period, you may make your monthly payments at the Trial Period monitial payment amount, which is 1684.04 instead of the amount shown on this statement.

Account information

Principal balance	 	531433455
Escrow balance.		 -55245
Interest rate	 	 5990%
Prepayment penalty	 	Ņa

4.00

Past payments breakdown

	Pad since tax salement	Paid year to date
Principal	\$582.02	S5.691.B2
Interest	\$1,571. 9 6	\$1584793
Escrow (taxes and insurance)	537291	54,894.57
Fees, charges, and advances	\$0,00	50,00
Unapplied funds	รุโรชากา	\$2,450,45
Total	\$4,308.00	\$28,894.92

Explanation of total amount due

Principal	\$599 57
interest.	\$1,55431
Extract taxes and insurance)	533296
Regular monthly payment	\$2,486.94
Euren pedad fees and charges	\$0,00
Overdre payments, fees, and charges	51285723
Unapplied funds	-\$2,460.45
Total amount due	ST2,883.72

Please see the 'Other Important Information' section of this statement

Bank of America Home Loan

Amount due on January 1, 2014

52,486,94

Account number: 093212003 TINA L BALIM

Property address: 7230 BUTTONS RIDGE DRIVE LAS VEGAS, NV 89131

Bank of America, N.A. PQ Box 650070 Dallas, TX 75265-0079 Additional escrow

Additional orincipal

enciosed

093212003300000248694000248694

#586990058#093212003#

EXHIBIT 4

1271-27-00-0030581-0001-0074950

TINA L BAUM

Account 2003

I December 16, 2013

Page 2 of 6

Additional account information

Property Address	7230 BUTTONS RIDGE DRÎVE
Loan type	'30'Yr Conventional
Contractual remaining term	21 Years, 10 Months

Transaction activity (11/05/13 to 12/16/13)

Date	Description	Charges	Payments
11/06/13	Unapplied Funds Posted		2,154.00
11/07/13	Unapplied Funds Reversal		-2,526.89
11/07/13	Payment Posted - Thank you		2,526.89
12/06/13	Unapplied Funds Posted		2,754.00
12/11/13	COUNTY TAX PMT	······································	-742.00

Additional contact information



Housing Counstion Information: If you would like counseling or assistance, you can contact the U.S. Department of Housing and Urban Development (HUD). For a list of homeownership counselors or counseling organizations in your area, go to hud gow/offices/hsg/sfh/hcc/hcs.cfm or call 1.800.569.4287.

General Inquiries	To mail a payment	Overnight mail	Insurance matters
PO Box 5170 Simi Valley, CA 93062-5170	PO Box 650070 Dallas, TX 75265-0070 Payments can also be made by phone, online, or at any Benk of America Banking center.	Retall Payment Services, TX1-160-06-01 Dallas InfoMart; STE 6020 1950 N Sternmons FWY Dallas, TX 75207-3134 Accepts overnight mail only. In-person payments are not accepted at this	Insurance Dept. PO Box 951291 Fort Worth, TX 76161-0291

acidress.

Notice of Error, Requests for Information and Qualified Written Requests (as defined in RESPA) must be sent to: PO Box 942019, Simi Valley, CA.93094-2019. You have certain rights under federal law to resolve errors and request information related to your account. For more information about these rights, you can go to bankofarmerica.com or contact us.

Payment processing information

The following payment options are available to you:

- PayPlan service With PayPlan you can have your mortgage payments automatically drafted from your checking or savings account. Call us at 1.866.767.4131 for more details or to enroll.
- Online Banking and Mobile Payments With these options, you can make your monthly mortgage monthly payment around the clock Visit us at bankofamerica.com for more details.

You can make your payment

- By automatic draft payment using PayPlan
- Online at bankofamerica.com
- By phone call 1.800.669.6507
- At any Bank of America banking center
- By mail using the enclosed envelope

For checks or money orders

- Make your check payable to Bank of America, N.A.
- Please write your loan number on the check or money order
- · Include this payment coupon with your check (do not staple your check to the coupon)
- Please do not send cash or include correspondence



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Bankof America Home Loans

Your Home Loan Account

TINA L BAUM | Account 2003 | December 16, 2013 | Page 3 of 6

- Mortgage Pay on the Web (MPW) This service allows you to make your monthly mortgage payment online. With MPW, there is no usage
 fee when selecting to pay from a Bank of America checking or savings account. If you choose to have your payment drafted from another
 financial institution account, there is no fee for drafting during the first half of your grace period; however, a S6 usage fee will be charged if
 the payment is drafted during the second half of the grace period.
- Pay By Phone There is no fee if-paying from a Bank of America checking or savings account. There is a \$15 fee for using the automated pay-by-phone service, if paying from another financial institution checking or savings account. If you choose to process a payment through a Customer Service Representative, there is a \$20 fee for this service.

Payments are considered received by Bank of America, N.A. when received through the means or at the locations designated above, or at such other locations as may be designated by Bank of America, N.A. If your loan is in default; based on certain conditions, such as bankruptcy or foreclosure, you may be unable to make a payment using one or more of the means or locations listed in the "Additional contact information" section. Payments received pursuant to a PayPlan will be processed in accordance with the PhonePay agreement. Payments received pursuant to a PhonePay will be processed in accordance with the PhonePay agreement. Payments received pursuant to a Bank of America Bill Pay. Transfer and Mortgage Pay on the Web options, will be processed in accordance with the Bill Pay. Transfer and Mortgage Pay on the Web agreement. For mailed payments, if you do not mail your payment coupon with your payment or do not mail your payment to the designated payment location, it may cause delays in the processing of your payment. Payments mailed with the payment coupon to the designated location which are received by 5:00 pm. In the time zone of the designated payment location will be credited to your account effective on that business day, unless otherwise specified on the remittance coupon provided. All payments mailed to Bank of America, N.A. must be in the form of a check or money order (drawn in United States dollars and payable by a United States financial institution or the United States Postal Service) made payable to Bank of America, N.A. Certified or other forms of payment may be required if previously advised.

If you are planning to pay off your loan please contact us at least 10 days before your scheduled draft date to cancel your service at 1.800.569.6607. This will avoid any drafts occurring in conjunction with your payoff transaction.

Any full periodic payment that is received and accepted will be applied to the longest outstanding periodic payment due, unless otherwise expressly prohibited or limited by your loan documents, the owner/insurer/guarantor of your loan or applicable law. Payments will be applied as described in your loan documents, including any modifications to the original documents. If your loan is current, please specify how you want any additional amounts you pay to be applied to your account. If you do not specify, subject to your loan documents, additional amounts will first be applied to fees or other amounts owed on your account and the remainder applied as a principal reduction; if we are unable to apply additional amounts to your account as you specify, we may return the funds to you. Postdated checks will be processed on the date received unless an authorized representative agrees to honor the date written on the check as a condition of a repayment plan.

We may charge you a fee of up to \$40.00 for any payment returned or rejected by your financial institution according to your loan documents and applicable law. In addition, there may be fees for certain services related to the servicing of your loan – these fees are either listed on our website or will be quoted upon request. All fees are subject to change without prior notice.

Partial payment policy: A partial payment is a payment less than your full periodic payment due. Depending on the requirements of your loan documents, the owner/insurer/guarantor of your loan or applicable law, and, depending on the status of your account, partial payments may be promptly returned to you, applied to your account or held in a non-interest bearing account for a period of time until you send us additional funds sufficient to equal a full periodic payment due. If your loan is current and your loan documents, permit us to apply partial payments to your account, partial payments will be applied as you specified, and, if not specified, according to your loan documents, they will first be applied to fees or other amounts owed on your account and the remainder applied as a principal reduction. If we are unable to apply partial payments to your loan as you specify, we may return the payment to you. If your loan is not current and your loan documents permit us to hold a partial payment in a non-interest bearing account, we will do so until you send us additional funds sufficient to equal a full periodic payment due. If you don't send us additional funds subject to your loan documents, we may apply some or all of the partial payment to amounts owed on your account and return the balance of the payment to you. If your loan is in default and declared due and payable or your loan is in foreclosure, we may be unable to accept or apply partial payments and will return them to you.

Interest calculation: For all full month payment periods, interest is calculated on a monthly basis. Accordingly, interest for all full months, including February, is calculated as 30/360 of annual interest, irrespective of the actual number of days in the month. For partial months, interest is calculated daily on the basis of a 365 day year.

Other important information

Amount to bring your loan current: The total amount in this section represents the total of (1) all periodic principal, interest and escrow (if applicable) payments now due under your loan documents, including past due payments and (2) the periodic principal, interest and escrow (if applicable) payment of the current payment due under your loan documents as indicated on this statement. If you submit funds sufficient to cover this total amount, your loan will be considered current with respect to the periodic principal, interest and escrow (if applicable) payments due under your loan. Please note, if you only submit this total amount, you may still owe additional amounts on your account, such as late payment fees and other fees as well as amounts for any optional products you may have elected to receive. If you want to pay those amounts as well, please include additional funds. In addition, the calculation of this total amount does not include any unapplied funds related to your account, if applicable.

Bank of America, N.A., is required by law to inform you that this communication is from a debt collection if you are currently in a bankruptcy proceeding or have previously obtained a discharge of this debt under bankruptcy law, this notice is for informational purposes only and is not

TINA L BAUM

Account 2003

December 16, 2013

Page 4 of 6

an attempt to collect a debt, a demand for payment or an attempt to impose personal liability for a discharged debt.

Credit reporting notice: We may report information about your account to credit bureaus. Late payments, missed payments or other defaults on your account may be reflected in your credit report.

Learn more about your new statement.

Refer to the guide included with your first new statement to learn more about key sections and specific features. You can also access this guide at http://message.bankofamerica.com/StatementInformation. If you have any questions, feel free to call us at the customer service number printed on your statement.

Paid year to date: Balances in the Past Payment Breakdown section should NOT be used for year-end tax reporting. Please use the Information on IRS Form 1098 that will be provided during tax season for reporting purposes. Balances for loans that have been service-transferred or have undergone modification will reflect activity that has occurred since the date of transfer or modification only.

Payoff: You can request payoff figures by calling 1/800,669,5833. If Bank of America, N.A. receives funds greater than the amount required to pay off your loan, we will automatically process and refund the overage within 20 business days after the payoff.

Statement information: The information contained in this statement is accurate as of the date of this statement but may not contain all information related to your loan. For the most up to date and complete information regarding your loan, please contact customer service.

Unapplied funds: Depending on the requirements of your loan documents, the owner/insurer/guarantor of your loan or applicable law, funds you send us cannot be applied to your loan and we hold these funds in a non-interest bearing account until they can be applied. For example, if you send us a partial payment (i.e. a payment less than your full periodic payment due), we may be unable to apply the payment to your loan and will hold the funds in the non-interest bearing account for a period of time until you send us additional funds sufficient to equal a full periodic payment due. If you don't send us additional funds, subject to your loan documents, we may apply some or all of the unapplied funds to amounts owed on your account and return the balance of the unapplied funds to you. This balance represents the amount of your funds being held in the non-interest bearing account, as of the date of this statement.



Bank of America Home Loans

Your Home Loan Account

TINA L BAUM

FAccount 2003

December 16, 2013

Page 5 of 6

Delinquency notice



You are late on your mortgage payments Failure to bring your loan current may result in fees and foreclosure – the loss of your home. As of December 16, 2013, you are 137 days delinquent on your mortgage loan. If you are experiencing financial difficulty, see the Additional contact information section in your statement for information about mortgage counseling or assistance.

Recent account history

Payment due date	Payment amount due	Unpaid balance due	Outstanding balance due
07/01/13	\$0.00	Fully paid on 11/07/13	\$0.00
08/01/13	52,526.89	\$66.44	\$66.44
09/01/13	\$2,526.89	\$2,526.89	\$2,593.33
10/01/13	\$2,526.89	\$2,526.89	\$5,120.22
11/01/13	52,469.22	\$2,469.22	\$7,589.44
12/01/13	52,486,94	52,485.94	\$10,076.38
01/01/14	\$2,486.94	\$2,485,94	\$12,563.32

This represents the total outstanding and current principal, interest and escrow (if applicable) due and you must pay \$12,563.32 to bring your loan current.* For all amounts due on your loan, please refer to the Total amount due on the first page of this statement.

Programs to which you have agreed



You are currently participating in a Trial Payment Plan of you have any questions regarding your monthly payment, please contact your Customer Relationship Manager.

There has been a payment default or other default on your loan that could result in acceleration of all sums due under the note. As a result, Bank of America, N.A. will use companies, including its affiliates LandSafe Default, Inc., LandSafe Services, LLC., LandSafe Title of California, Inc., LandSafe Title of Washington, Inc., LandSafe Title of Florida, Inc., LandSafe Services of Alabama, Inc., LandSafe Title of Texas, Inc., ReconTrust Company, N.A., and LandSafe Appraisal Services, Inc., to provide services required to protect the note holder's interest and rights in the property and under the note and security instrument, including any remedies thereunder (the "Default Related Services"). Bank of America, N.A. will assess fees to your loan account for the Default Related Services, including those provided by its affiliates. A schedule of fees that may be charged to your account for Default Related Services is available at the following web address: http://www.barkofamerica.com/defaultfees. if you do not have internet access, please contact customer service to have a fee schedule mailed to you. The fee schedule contains a complete list of the Default Related Services you could be charged, however it does not include a complete list of all fees or charges that could be assessed on your loan account.

As long as your loan remains delinquent, Bank of America, N.A. will conduct inspections of your property on a periodic basis. These inspections are provided for in your loan documents.

TINA L BAUM 1 Account 2003 | December 16, 2013 Page 6 of 6



Bill History

to show a list for specific settings. Bill History To view payments and bills for a different date range, select an option in Current View. Use the Additional Options box

Current View

Specific date range Up to 24 months

	For B of A 12003
300 .	Show Biller Mame
	To 05/01/2014
	From 06/01/2012
	saoisqO lsaoisibbA-

Biller Name Category Amount Amount Pay Date

How do I sort search or categorize?

Payments 1 - 23 of 23

1 of 2

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Моп <u>ра</u> де 12003 • 12003	19886+	\$2154.00	£107/\$0/L0	bis4	View Detail
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A lo a	19886*	00.42152	£10Z/90/60	bisq	View Detail
Mongage Tina's house •12003					
A lo B	19886+	\$2154.00	10/04/2013	Paid	View Detail
e 17003 Tima's house Mortgage				ļ. 	
A lo B	19886+	52154.00	11/06/2013	Paid	View Detail
ऋखुत्रoM FisaiT •12003					
BotA	19886•	\$2154.00	15/06/2013	Paid	Vew Detail
Mortgage Tina's house •12003					
A 30 E	19886•	\$2154.00	102/90/10	bis4	Mew Detail
Mort gage Tina's house •12003					
A10 a	19886*	\$2154.00	\$102/90/20	bisq	View Detail
Mortgage Tina's house •12003					
B of A	19886+	00.4215\$	03/06/2014	bisq	View Detail
Montgage Ting's house •12003					,
BofA	19886+	00.4215%	04/04/2014	bisq	View Detail

D 64	*98861	\$2154.00	06/06/2013	Paid	View Detail
B of A Mortgage Tina's house *12003	798801	\$2154.00	00/00/2013	raid	View Detail
B of A Mortgage Ting's house •12003	*98861	\$2154.00	05/06/2013	Paid	View Detail
B of A Mortgage Ting's house	*98861	\$2154.00	04/05/2013	Paid	<u>View Detail</u>
*12003 B of A Mortgage	*98861	\$2154.00	03/06/2013	Paid	View Detail
Tina's house •12003 B of A	*98861	\$2154.00	02/06/2013	Paid	View <u>Detail</u>
Mortgage Tima's house 12003	76601	32154.00	02 00 2013		
B of A Mortgage Tina's house	*98861	\$2154.00	01/04/2013	Paid	View Detail
*12003 B of A Mortgage Tima's house	*98861	\$2154.00	12/06/2012	Paid	<u>View Detail</u>
*12003 B of A	*98861	\$2154.00	11/06/2012	Paid	<u>View Detail</u>
Montgage Tina's house *12003			10/05/2013	n : 1	15 ave Datail
B of A Mortgage Time's house *12003	*98861	\$2154.00	10/05/2012	Paid	View Detail
B of A Mortgage Tina's house	*98861	\$2154.00	09/06/2012	Paid	View Detail
•12003 B of A	*98861	\$2154.00	08/06/2012	Paid	<u>View Detail</u>
Mortgage Tina's house •12003					
B of A Mortgage Tima's house •12003	*98861	\$2154.00	07/06/2012	Paid	View Detail
B of A Mortgage Tima's house *12003	*98861	\$2154.00	06/06/2012	Paid	View Detail

Total \$49542.00 Includes Paid, Pending, and Processing amounts only.

Payments 1 - 23 of 23

February 10, 2014

CERTIFIED MAIL

TRANS UNION CORPORATION P.O. Box 2000 Chester, PA 19022

Re: TINA L. BAUM

Dear Sir:

This letter is a dispute. I attach an excerpt from my recent credit profile.

Please revise the attached BOA [BAC] account to reflect a current status with no delinquencies. I purchased my home in 2005 in my name only. My agreement with BOA explicitly provided for no escrow account. All payments were timely made including all tax and insurance payments which I personally paid directly to the Assessor and my insurance company.

Notwithstanding, my problems with BOA began in 2009 when I received a notice from BOA to increase the mortgage payment for my ostensibly unfunded impound account. I called BOA advising there was no impound account and the charges were ultimately reversed with the impound account "waived." However, this protracted ordeal continued over the next four years to the present with a slew of notices and/or contacts corresponding to substantial delinquencies on my credit profiles and this status exists despite repeated confirmations from BOA that I was never late with either my mortgage payments, taxes or insurance. Simply, for some inscrutable reason, BOA keeps paying taxes and insurance which have already been paid.

I have attached my November 15th, 2013 federal Complaint which further details my ordeal with BOA.

You'll note that my profile is absolutely flawless but for BOA's and your misreporting. Please update my report. Respectfully, I will sue you under the Fair Credit Reporting Act if my tradeline is not properly corrected.

Thank you in advance for your anticipated courtesy.

Very truly yours,

ina h. Baum

Enclosures

EXHIBIT 6

Typically, creditors report any changes made to your account information monthly. This means that some

SELF

KEITA G HYMKINZ FYZ AEGYZ' NA WEDICYT CYKE MOKKEK 09/01/5001

Employer Name Date Venned Розгиол Госяпоп

Employment Data Reported:

ELT9-515 (0E9)

7978-098 (707)

0585-959 (201)

Telephone Numbers Reported:

8000 GREENS BLOCK CT, LAS VEGAS, NV 89129 12/17/2007

PO BOX 10219, VAN NUYS, CA 91410-0219 01/31/2010

2320

1530 BOLLONZ KIDGE DK' TYZ AEGYZ' NA 89131-

8690 QUEENS BROOK CT, LAS VEGAS, NV 89129- 10/23/2006

1290 DAKOTA AVE N, HURON, SD 57350-4547

2230

8105 QUEENS BROOK CT, LAS VEGAS, NV 89129- 02/28/2009

Date Reported

Addresses Reported:

TINY L. BAUM

Names Reported:

04/77/1970

Date of Birth:

Your SSN has been masked for your protection.

77LS-XX-XXX

:NSS

You have been on our files since 05/01/1992

. Housemour landers 4.

-Begin Credit Report-

\$301320E4 File Number: accounts listed below may not

reflect the most recent activity until the creditor's next reporting. This information may include things sur balances, payments, dates, remarks, ratings, etc. The key(s) below are provided to help you understand so the account information that could be reported.

Rating Key

Some creditors report the timeliness of your payments each month in relation to your agreement with the ratings in the key below describe the payments that may be reported by your creditors. Please note: Some not all of these ratings may be present in your credit report.

RIR								1
Not Reported	Bildnown;	Garent	30 Mars	50 fin's 90 c	lays 1204 days	Collection S	oluntary Republication Communication Communi	Charge Off Fore

Remarks Key

Additionally, some creditors may notate your account with comments each month. We refer to these credit comments as 'Remarks'. The key below gives the descriptions of the abbreviated remarks contained in you credit file. Any remark containing brackets > < indicates that this remark is considered adverse.

CBC ACCOUNT CLOSED BY CLO CLOSED

CONSUMER

Adverse Accounts

Adverse information typically remains on your credit file for up to 7 years from the date of the delinquency help you understand what is generally considered adverse, we have added >brackets< to those items in this report. For your protection, your account numbers have been partially masked, and in some cases scramble

BAC HOME LOANS SERV LP #9321****

4161 PIEDMONT PKWY GREENSBORO, NC 27410 (800) 451-6362

Date Opened: Date Updated: Pay Status:

04/25/2005 07/10/2013 >Account 90 Days Past Due Date<

Responsibility: Payment Terms:

Individual Account Received: \$2,526 per month, paid Monthly for 36

Account Type: \$2,526 month

Mortgage Account Last Payment >Maximum Delinquency of 120 days i

Loan CONVENTIONAL REAL ESTATE Made: 12/2012<

Type: MTG 07/05/2013

Mortgage Info:

Freddie Mac ID #100059600087806860 Acct #110843681

Estimated month and year that this item will be removed: 12/2018

Amount Due \$2,526 \$2,52

High Balan				9,650		59,650\$3			norana ^{(A}			
Rating	90	90	90	60	60	60) 9	90	120	90	60	
Balance	09/2 \$321	012 08/2	01207/2			/ 2012 04 23,307\$3				1201/20	1212/2	2011
Amount Du						2,502						
Amount Pa	- TO -	,502 S0		-	\$0	\$0			0			
Past Due		,005		\$5		5,005					15	
High Balan	1000	•				9,650\$3						
Rating	60	30	60					50	30	OK	30	
Rating	00	50	00	00	00	00		,,,	50	OIL	50	
	11/20	1110/20	1109/20	1108/20	1107/20	11 06/20	11 05/2	2011 0	4/2011	03/2011	02/20	011
Balance	11/20	1110/20	. 105120	1100/20	1101120					\$329,649		
Amount Due										\$2,153		
Amount Pai						,,,	\$0	\$0	\$0		500 TO 100 TO 10	\$0
Past Due	u						\$0	\$0	\$0	\$(\$0
High Balanc	.0					\$359,6						1.50
Rating	OK	30	OF	30	OK						OK	050
Kating	OIL	50	OR	20	OK	OIL	OIL	0.		J.C.	OK	
01/201	1112/20	01011/20	1010/20	1000/20	1002/20	1007/20	1006/20	11005/	201004/	2010		
RatingOK	OK	OK	OK	OK		OK		OK				
Mingon	O.L	O1L	O1L	, OIL	011			011				
. 03/201	002/20	1001/20	1012/20	0911/20	0910/20	0909/20	0908/20	00907/2	200906/	2009		54
RatingOK	30		OK			OK		OK				
Radingon	20	20	OIL	O1L	OZE	014		. 011	OIL			
. 05/200	on <i>i//</i> 20	0903/200	1902/20	0901/20	0912/20	0811/20	0810/20	0809/2	00808/	2008		
RatingOK			OK		OK		OK		OK			
rumgor.	OZL		. 011	OIL	011	011	011	011	. 011	* *		
07/200	206/20	0805/200	1204/200	1203/200	2802/200	0201/200	1812/20	0711/2	00710/2	2007		
RatingOK	OK			0.7		OK	OK	OK	OK			
raingon	OIL	OIL	OIL	OIL	OIL	OZE	OIL	OIL	OIL			
09/200	708/200	0707/200	706/200	705/200	704/200	703/200	702/20	0701/2	007177	006		
RatingOK	OK	OK.	OK		and the state of t	TO THE REAL PROPERTY.	OK	OK	OK	.000		
Raingon	OIL	OIL	OIL	OIL.	OIL	Öİ	OIL	OIL	OIL			
11/2006	10/200	609/200	6									
	OK	OK	-									
rum 50rc	JIL											
				_								

Satisfactory Accounts

The following accounts are reported with no adverse information. For your protection, your account number have been partially masked, and in some cases scrambled.

AMERICAN EXPRESS #349990835364****
PO BOX 981537

EL PASO, TX 79998 (800) 874-2717

```
Case 2:13-cv-02109 Document 1 Filed 11/15/13 Page 1 of 16
             MITCHELL D. GLINER, ESQ.
             Nevada Bar #003419
             3017 West Charleston Blvd., #95
             Las Vegas, NV 89102
              (702) 870-8700
              (702) 870-0034 Fax
             Attorney for Plaintiff
           5
                                  UNITED STATES DISTRICT COURT
           6
                                       DISTRICT OF NEVADA
           7
           8
             TINA BAUM,
           9
                                            Case No.
                   Plaintiff.
          10
             VB.
          11
                                            JURY DEMANDED
             BANK OF AMERICA, N.A.
          12
                  Defendant.
          13
  LINK CITICES
MITCHELL D. GLDER
   Ottorieston Bird. 14
Bisho 65
is, Moreita 69102
                                            COMPLAINT
          15
  (702) 879-6700
                                          JURISDICTION
          16
                        The jurisdiction of this Court attains pursuant to the
                   1.
          17
             FCRA, 15 U.S.C. Section 1681(p), and the doctrine of supplemental
          18
             jurisdiction. Venue lies in the Southern Division of the Judicial
          19
             District of Nevada as Plaintiff's claims arose from acts of the
         20
             Defendant perpetrated therein.
         21
         22
                                     PRELIMINARY STATEMENT
         23
                  2.
                        The Plaintiff brings this action for damages based upon
         24
            Defendant's violations of the Fair Credit Reporting Act, 15 U.S.C
         25
             § 1681 et seq. (hereinafter referred to as "FCRA"), and of state
         26
             law obligations brought as supplemental claims including, but not
         27
            limited to, defamation and invasion of privacy.
         28
```

*** 330135064-009 *** P.O. Box 2000 Chester, PA 19022-2000





02/24/2014

Transilinion

Our investigation of the dispute you recently submitted is now complete. The results are listed below. If an item you disputed is not in the list of results below, it was either not appearing in your credit file or it already reflected the corrected status at the time of investigation.

If our investigation has not resolved your dispute, you may add a 100-word statement to your report. If you provide a consumer statement that contains medical information related to service providers or medical procedures, then you expressly consent to TransUnion including this information in every credit report we issue about you. If you wish to obtain documentation or written verification concerning your accounts, please contact your creditors directly.

If there has been a change to your credit history resulting from our investigation, or if you add a consumer statement, you may request that TransUnion send an updated report to those who received your report within the last two years for employment purposes, or within the last six months for any other purpose.

If interested, you may also request a description of how the investigation was conducted along with the business name, address and telephone number of the source of information.

Thank you for helping ensure the accuracy of your credit information.

For frequently asked questions about your credit report, please visit http://transunion.com/consumerfags.

Investigation Results

ITEM DESCRIPTION RESULTS

BAC HOME LOANS SERV LP # 9321**** NEW INFORMATION BELOW

EXHIBIT 7

Case 2:15-cv-01599-GMN-GWF Document 1 Filed 08/20/15 Page 29 of 43

Page: 1 of 1

File Number: Date Issued:

330135064 02/24/2014



-Begin Credit Report-

Typically, creditors report any changes made to your account information monthly. This means that some accounts listed below may not reflect the most recent activity until the creditor's next reporting. This information may include things such as balances, payments, dates, remarks, ratings, etc. The key(s) below are provided to help you understand some of the account information that could be reported.

Rating Key

Some credition report the timeliness of your payments each month in relation to your agreement with them. The ratings in the key below describe the payments that may be reported by your creditors. Any rating that is shaded indicates that it is considered adverse. Please note: Some but not all of these ratings may be present in

N/R X OK 30	60 90	120 COL	VS RPO	C/O FC
Not Reported Unknown Current 30 days late	60 days late 90 days late	120+ days Collection	Voluntary Repossession	Charge Off Foreclosure
0.0000000000000000000000000000000000000			Surrencer	上。2011年

Adverse Accounts

BAC HOME LOANS SERV LP #9321**** (4161 PIEDMONT PKWY, GREENSBORO, NC 27410, (800) 451-6362)

Date Opened:

04/25/2005

Balance:

Past Due:

\$314,334

Pay Status: >Account 120 Days Past Due Dates

Responsibility:

Individual Account

Date Updated:

Terms:

Mortgage Account

02/24/2014

\$2,526 per month, paid Monthly for

Account Type:

Payment Received: \$0

360 months

Loan Type:

CONVENTIONAL REAL ESTATE MTG

Last Payment Made: 11/06/2013> High Balance:

\$359,650 >\$10,0494 Maximum Delinquency of 120 days in 11/2012

and in 02/2014 for \$10,0494

Mortgage Info: Freddie Mac ID #100059600087806860 Acct #110843681

Remarks: ACCT INFO DISPUTED BY CONSUMR

Estimated month and year that this item will be removed: 12/2018

		i will be ichie									
01/2014	12/2013	11/2013	10/2013	09/2013	08/2013	07/2013	06/2013	05/2013	04/2013	03/2013	02/2013
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- End of investigation results -

To view a free copy of your full, updated credit file, go to our website www.transunion.com/fullreport -End of Credit Report-

March 25, 2014

CERTIFIED MAIL

Trans Union Corporation P.O. Box 2000 Chester, PA 19022

Re: TINA L. BAUM

Dear Sir:

This letter is a dispute. I attach an excerpt from my recent credit profile.

Please revise the attached BOA [BAC] account to reflect a current status with no delinquencies. I purchased my home in 2005 in my name only. My agreement with BOA explicitly provided for no escrow account. All payments were timely made including all tax and insurance payments which I personally paid directly to the Assessor and my insurance company.

Notwithstanding, my problems with BOA began in 2009 when I received a notice from BOA to increase the mortgage payment for my ostensibly unfunded impound account. I called BOA advising there was no impound account and the charges were ultimately reversed with the impound account "waived." However, this protracted ordeal continued over the next four years to the present with a slew of notices and/or contacts corresponding to substantial delinquencies on my credit profiles and this status exists despite repeated confirmations from BOA that I was never late with either my mortgage payments, taxes or insurance. Simply, for some inscrutable reason, BOA keeps paying taxes and insurance which have already been paid.

I have attached my November 15th, 2013 Federal Complaint which further details my ordeal with BOA.

March 25, 2014 Trans Union Corporation Page 2

I have also attached BOA's December 16, 2013 Letter/Statement. Incomprehensibly, BOA states on page 5 I am "currently participating in a Trial Payment Plan...to which [I] have agreed." Please do not verify BOA's reporting without first acquiring from BOA the actual Trial Payment Plan to which I have allegedly agreed. This is the core of the problem-I NEVER HAVE AND NONE EXISTS!

You'll note that my profile is absolutely flawless but for BOA's and your misreporting. Please update my report. Respectfully, I will sue you under the Fair Credit Reporting Act if my tradeline is not properly corrected.

Thank you in advance for your anticipated courtesy.

Very truly yours,

Tina L. Baum

Enclosures

File Number: 330135064

-Begin Credit Report-

Personal information !

You have been on our files since 05/01/1992

SSN:

XXX-XX-5724

Your SSN has been masked for your protection.

Date of Birth:

04/22/1970

Names Reported:

TINA L. BAUM

Addresses Reported:

Address Date Reported

8705 QUEENS BROOK CT, LAS VEGAS, NV 89129- 02/28/2009

2230

1290 DAKOTA AVE N, HURON, SD 57350-4547 03/28/2006

8690 QUEENS BROOK CT, LAS VEGAS, NV 89129- 10/23/2006

2229

7230 BUTTONS RIDGE DR, LAS VEGAS, NV 89131-

2320

PO BOX 10219, VAN NUYS, CA 91410-0219 01/31/2010

8690 GREENS BLOCK CT, LAS VEGAS, NV 89129 12/17/2007

Telephone Numbers Reported:

(702) 656-5830

(702) 860-8462

(630) 515-6273

Employment Data Reported:

Employer Name Location Position

Date Verified

KELLY G HAWKINS LAS VEGAS, NV MEDICAL CARE WORKER 09/01/2001

SELF

Account information:

Typically, creditors report any changes made to your account information monthly. This means that some

accounts listed below may not

reflect the most recent activity until the creditor's next reporting. This information may include things balances, payments, dates, remarks, ratings, etc. The key(s) below are provided to help you understant the account information that could be reported.

Rating Key

Some creditors report the timeliness of your payments each month in relation to your agreement with t ratings in the key below describe the payments that may be reported by your creditors. Please note: So, not all of these ratings may be present in your credit report.

R/R	x e			
Not Reported	Ontarion Content	States to days Street	201-days Collection Sourced Sourced	Report Charge Of a

Remarks Key

Additionally, some creditors may notate your account with comments each month. We refer to these crecomments as 'Remarks'. The key below gives the descriptions of the abbreviated remarks contained in y credit file. Any remark containing brackets > < indicates that this remark is considered adverse.

CBC ACCOUNT CLOSED BY CLO CLOSED CONSUMER

Adverse Accounts

Adverse information typically remains on your credit file for up to 7 years from the date of the delinquent help you understand what is generally considered adverse, we have added >brackets< to those items in the report. For your protection, your account numbers have been partially masked, and in some cases scramble

BAC HOME LOANS SERV LP #9321****

4161 PIEDMONT PKWY GREENSBORO, NC 27410 (800) 451-6362

Date Opened:	Date Updated:	Pay Status:
04/25/2005	07/10/2013	>Account 90 Days Past Due Date<
Responsibility:	Payment	Terms:
	Descionale	62 526 nor month -: 126 41 6 2

Individual Account Received: \$2,526 per month, paid Monthly for 36
Account Type: \$2,526 months

Mortgage Account

Last Payment >Maximum Delinquency of 120 days i

Loan CONVENTIONAL REAL ESTATE Made: 12/2012<

Type: MTG 07/05/2013

Mortgage Info:

Freddie Mac ID #100059600087806860 Acct #110843681 Estimated month and year that this item will be removed:

12/2018				
Amount Due	\$2,526	\$2,526	\$2,526	\$2,526
	\$2,526	\$2,526	\$0	- \$0
Past Due	\$7.580	\$7,580	\$5,053	\$5,053

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The following accounts are reported with no adverse information. For your protection, your account number have been partially masked, and in some cases scrambled.

AMERICAN EXPRESS #349990835364**** PO BOX 981537 EL PASO, TX 79998 (800) 874-2717

```
Case 2:13-cv-02109 Document 1 Filed 11/15/13 Page 1 of 16
              MITCHELL D. GLINER, ESQ.
             Nevada Bar #003419
             3017 West Charleston Blvd., #95
             Las Vegas, NV
                             89102
              (702) 870-8700
              (702) 870-0034 Fax
             Attorney for Plaintiff
                                 UNITED STATES DISTRICT COURT
                                      DISTRICT OF NEVADA
           8
             TINA BAUM,
           9
                                           Case No.
                  Plaintiff,
          10
             VS.
          11
                                           JURY DEMANDED
             BANK OF AMERICA, N.A.
                  Defendant.
 LAW OFFICES 13
MITCHELL D. GLINER
      den Blod 14
   Saba 95
                                           COMPLAINT
          15
  (762) 670-6700
                                         JURISDICTION
         16
                       The jurisdiction of this Court attains pursuant to the
                  1.
         17
            FCRA, 15 U.S.C. Section 1681(p), and the doctrine of supplemental
         18
            jurisdiction. Venue lies in the Southern Division of the Judicial
         19
            District of Nevada as Plaintiff's claims arose from acts of the
         20
            Defendant perpetrated therein.
         21
         22
                                    PRELIMINARY STATEMENT
         23
                       The Plaintiff brings this action for damages based upon
                 2.
        24
            Defendant's violations of the Fair Credit Reporting Act, 15 U.S.C
        25
            § 1681 et seq. (hereinafter referred to as "FCRA"), and of state
        26
            law obligations brought as supplemental claims including, but not
        27
            limited to, defamation and invasion of privacy.
        28
```

Bankof America

Simi Valley, CA 93062-5270

003058102AYE357 MAJO 70 1271 89129-223005 - CZP20611412 TINA L BAUM

8705 QUEENS BROOK CT LAS VEGAS NV 89129-2230



միկրանիակին իրկանակին հանակունիանի հայանի հայարա

Customer service information

Cuspimer service: 1.890.669.6607

TD9/TTY users only: 1.800300.5407

En Español 1.800.295.0025

Monday-Friday 7am to 7pm Local Time

bankofamerica.com

Account number

093212003

Pagient de date

∌anuary 1, 2014

Total Amount Dise

\$12,883.72

Your Home Loan Account

Statement date: December 16, 2013X



Period remining the first state of the amount shown on this statement.

Account information.

Principal balance			 -	133425
Escrow balance.	F 4.	-		-32549
aterest rate			••••	.5 9 05
Prepayment penalty				Мa

Explanation of total amount due

Piscoal	559957
Marcat	\$1:554:31
Example (laws and insurance)	\$332.96
Regular monthly payment	\$2,485.94
Cities provides as threes	
Description of the second compes	51225723
Victorial Contraction	-52.450:45
Te danient die	\$12365777

Past payments breakdown

ę,	id alliella saidehear.	Raid year to think
Proceed	\$589,02	इंडाम
Interest	S157195	\$1 5847.98
Escrow (taxes and insurance)	\$37291	54 <i>6</i> 94 <i>67</i>
her dages and advances	\$000	\$9,00
Unapplied Fires	51781111	\$2,450,45
Total	.\$4,308.00	\$28,894.92

Reese see the 'Other important information' section of this stotement

Bank of America Home Loss

Amount due on January 1, 2014

\$2,486,94

Account number 093212003 TINA L BALIM

Property address: 7230 BUTTONS RIDGE CRIVE LAS VEGAS, MV 89131

Bank of America, N.A. PQ 80x 65007.0 Dallas, TX 75265-0079 Additional escrow.

եթեւնու լի իրանի երկանի իրանի արանի արա

093212003300000248694000248694

#: 586990058#: 093 2 I 200 3#

1271-27-00-009033 1:0001-007-4960

*** 330135064-012 *** P.O. Box 2000 Chester, PA 19022-2000



04/09/2014

Our investigation of the dispute you recently submitted is now complete. The results are listed below. If an item you disputed is not in the list of results below, it was either not appearing in your credit file or it already reflected the corrected status at the time of investigation.

If our investigation has not resolved your dispute, you may add a 100-word statement to your report. If you provide a consumer statement that contains medical information related to service providers or medical procedures, then you expressly consent to TransUnion including this information in every credit report we issue about you. If you wish to obtain documentation or written verification concerning your accounts, please contact your creditors directly.

If there has been a change to your credit history resulting from our investigation, or if you add a consumer statement, you may request that TransUnion send an updated report to those who received your report within the last two years for employment purposes, or within the last six months for any other purpose.

If interested, you may also request a description of how the investigation was conducted along with the business name, address and telephone number of the source of information.

Thank you for helping ensure the accuracy of your credit information.

For frequently asked questions about your credit report, please visit http://transunion.com/consumerfags.

Investigation Results

ITEM DESCRIPTION RESULTS

BAC HOME LOANS SERV LP # 9321**** VERIFIED, NO CHANGE

EXHIBIT 9

Case 2:15-cv-01599-GMN-GWF Document 1 Filed 08/20/15 Page 38 of 43

Page: 1 of 1

File Number: Date Issued:

330135064 04/09/2014



-Begin Credit Report-

TransUnion.

Account Information

Typically, creditors report any changes made to your account information monthly. This means that some accounts listed below may not reflect the most recent activity. until the creditor's next reporting. This information may include things such as balances, payments, dates, remarks, ratings, etc. The key(s) below are provided to help you understand some of the account information that could be reported.

Rating Key

Some creditors report the timeliness of your payments each month in relation to your agreement with them. The ratings in the key below describe the payments that is may be reported by your creditors. Any rating that is shaded indicates that it is considered adverse. Please note: Some but not all of these ratings may be present in a your credit report.

N/R X OK 30 60 90 120 COL VS	G/O FC
Not Reported Unknown Current 30 days late 60 days late 90 days late 120+ days Collection Surrender Repossession	n Charge Off Foreclosure
[2] 是是我们的 第二次 [4] 在我们的 [4] 对自己的 [4] 对自	1. 数元 有二部以此,此一年一年,由于10年,日本日本日本日本日本日本日本日本日本日本日本日本日本日本日本日本日本日本日本

Adverse Accounts

BAC HOME LOANS SERV LP #9321**** (4161 PIEDMONT PKWY, GREENSBORO, NC 27410, (800) 451-6362)

Date Opened: Responsibility:

04/25/2005

Individual Account

Balance:

\$314,334 02/24/2014

Pay Status: Account 120 Days Past Due Dated

\$2,526 per month, paid Monthly for

Account Type: Loan Type:

Mortgage Account CONVENTIONAL REAL ESTATE MTG

Date Updated: Payment Received: \$0

Last Payment Made: 11/06/2013 X

360 months >Maximum Delinquency of 120 days in 11/2012

High Balance: Past Due:

\$359,650 \$10,049 and in 02/2014 for \$10,049

Mortgage Info: Freddie Mac ID #100059600087806860 Acct #110843681

Remarks: ACCT INFO DISPUTED BY CONSUMR

onth and year that this item will be removed: 12/2018

				0							
01/2014	12/2013	11/2013	10/2013	09/2013	08/2013	07/2013	06/2013	05/2013	04/2013	03/2013	02/2013
X	X	X	90	90	90	90	90	90	90	60	60
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05/2008 04	/2008 03/20	008 02/2008	01/2008 17	2/2007 11/20	007 10/2007	09/2007 08	3/2007 07/20	07 06/2007	05/2007 04	2007	
QK	OK OK	OK	OK [ок ок	OK	OK	ОК ОК	OK	OK (OK]	
	01/2013 60 01/2012 20 01/2011 12 0K 09/2009 08 0K 05/2008 04	X X	X X X X	X X X 20	X X X 20 90 10/2013 12/2012 11/2012 10/2012 09/2012 60 90 120 29 60 120 29 60 120 29 60 120 20 60 12	X X X 20 90 90 90 90 90 90 90	X X X 20 90 90 90 90 90 90 90	X X X S0 90 90 90 90 90 90 90	X X X S0 S0 S0 S0 S0 S	X X X 20 90 90 90 90 90 90 90	X X X X 90 90 90 90 90 90 90 90 90 60 00 00 00 00 00 00 00 00 00 00 00 00

- End of investigation results -

To view a free copy of your full, updated credit file, go to our website www.transunion.com/fullreport

-End of Credit Report-



Prepared for: TINA L BAUM

Date: April 09, 2014

Report number: 0236-4855-46

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Dispute results

About our dispute process

This summary shows the revision(s) made to your credit file as a result of our processing of your dispute. If you still question an item, then you may want to contact the furnisher of the information directly or review the original information in the public record.

The federal Fair Credit Reporting Act provides that you may:

- request a description of how we processed your dispute, including the business name and address of any furnisher of information contacted in connection with such information and the telephone number if reasonably available;
- add a statement disputing the accuracy or completeness of the information; and
- request that we send these results to organizations who have requested your credit report in the past two years for employment purposes or six months for any other purpose.

If no information follows, our response appeared on the previous page.



Scan me with your smart phone for special offers from Experian. How to read your results

Deleted - This item was removed from your credit report

Remains - This item was not changed as a result of our processing of your dispute

Updated - A change was made to this item; review this report to view the change. If ownership of the item was disputed, then it was verified as belonging to you

Processed - This item was either updated or deleted; review this report to learn its outcome

Results

We have completed the processing of your dispute(s). Here are the results:

Credit items

Outcome

BANK OF AMERICA, N.A. 9321....

Updated

Visit experian.com/status to check the status of your pending disputes at any time

Additional information

To view a full copy of your corrected credit report, visit experian.com/viewreport

To receive a copy by maik check this box and within 30 | days return this original page to P.O. Box 9701, Allen, TX 75013.

Copies will not be accepted.

What's your credit score? Find out by ordering your VantageScore® from Experian for only \$7.95. To order, call 1 888 322 5583.

By law, we cannot disclose certain medical information (relating to physical, mental, or behavioral health or condition). Although we do not generally collect such information, it could appear in the name of a data furnisher (i.e. "Cancer Center") that reports your payment history to us. If so, those names display on your report, but on reports to others, they display only as MEDICAL PAYMENT DATA. Consumer statements included on your report at your request that contain medical information are disclosed to others.

PO Box 9701 Allen, TX 75013



Prepared for: TINA L BAUM

Date: April 09, 2014

Report number: 0236-4855-46

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Your accounts that may be considered negative

The most common items in this section are late payments, accounts that have been charged off or sent to collection, bankruptcies, liens, and judgments. It also may contain items that are not necessarily negative, but that a potential creditor might want to review more closely, such as an account that has been settled or transferred. This information is generally removed seven years from the initial missed payment that led to the delinquency. Missed payments and most public record items may remain on the credit report for up to seven years, except Chapters 7, 11 and 12 bankruptcies and unpaid tax liens, which may remain for up to 10 years. A paid tax lien may remain for up to seven years. Transferred accounts that have not been past due remain up to 10 years after the date the account was transferred.

1	Payment history legend	
	Current/Terms of agreement met	Voluntarily surrendered
	Account 30 days past due	Repossession
	Account 60 days past due	Paid by creditor
	Account 90 days past due	Insurance claim
	Account 120 days past due	G Claim filed with government
	Account 150 days past due	Defaulted on contract
	Account 180 days past due	Collection
	Creditor received deed	Charge off
	Foreclosure proceedings started	CLS Closed
	Foreclosed	ND No data for this time period

M Credit items

BANK OF AMERICA, N.A. 4161 PIEDMONT PKWY GREENSBORO NC 27410 Phone number (800) 451 6362 Partial account number 9321.... Address Identification number 0699130137 Mortgage Identification Number

Date opened Type Apr 2005 Mortgage First reported Terms Jan 2010 2 Years+ Date of status Monthly Feb 2014 payment \$2,526

Credit limit or original amount \$359,650 High balance Not reported

Recent balance \$314,334 as of Feb Individual 2014 Recent payment \$2,526

Responsibility Status >

Open. \$10,049 past due as of Feb 2014.

By Oct 2018, this account is scheduled to go to a positive status.

Comment

Account information disputed by consumer (Meets requirement of the Fair Credit Reporting Act).

This item was updated from our processing of your dispute in Sep 2013.

110843681 Payment history

100059600087806860 Freddie Mac ID

FEB JAN DEC NOV OCT SEP AUG JUL JUN MAY APR MAR FEB JAN DEC NOV OCT SEP AUG JU

AUG JUL JUN MAY APR MAR FEB JAN OK CHI OK TOK THE TOX JULY TOR

Account history - If your creditor reported your account balances to us, we list them in this section as additional information about your account. Your balance history may also include your credit limit and high balance or the original loan amount for an installment loan. This section also includes the scheduled payment amounts, amounts actually paid and the dates those payments were made. ND: No Data.

ATE = Account balance (\$) Date payment received = Scheduled payment amount (\$) Actual amount paid (\$) Nov13 Oct13 Sep13 Aug13 Jul13 May13 Apr13 Mar13 Feb13 Jan13 Dec12 Nov12 Oct12 Sep12 Aug12 Jul12 Jun12 May12 Apr12

314.334 314.916 315.495 316.071 316.645 317.215 317.783 318,348 318,910 319,469 320,026 321,131 321,131 321,131 321,678 322,224 322,767 323,307 323,845 May31 Apr05 Mar06 Feb14 Jan24 Dec31 Nov27 Oct30 Sep26 Aug31 Jul30

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Date: April 09, 2014

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Your accounts that may be considered negative (continued)

2,526 2,526 2,526 2,526 2,526 2,526 2,526 2,526 2,526 2,502 2,502 2,502 2,502 2,502 2,502 2,502 2,502 2,502 2,534 The original amount of this account was \$359,650 ND ND ND ND ND ND

Prepared for: TINA L BAUM Date: April 09, 2014
Report number: 0236-4855-46

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Natalie L. Winslow

Akerman LLP 1160 Town Center Drive Suite 330 Las Vegas, NV 89144 Tel: 702.634.5000 Fax: 702.380.8572

September 22, 2014

Mitchell Gliner 3017 W. Charleston Boulevard, Suite 95 Las Vegas, Nevada 89102 Mgliner@glinerlaw.com

RE: Tina Baum, case no. 2:13-cv-02109-KJD-CWH

Mr. Gliner:

This letter shall serve as a follow-up and confirmation to our previous discussions concerning the credit amendments made to your client's account by Bank of America.

Bank of America submitted a Universal Data Form to correct your client's credit on July 2, 2014. As of that date, the Bank's records still reflected an escrow account on your client's loan account, resulting in a total monthly payment amount of \$2,486.00 shown on the UDF. On August 1, 2014, the escrow account on your client's loan account was removed, resulting in a monthly payment amount of \$2,154.00 (which is the principal and interest payment on the account). As of September 4, 2014, the principal balance on your client's account is \$304,334.47. Your client's account is showing as current from its inception as of September 16, 2014. Your client's loan has been current from its inception.

Sincerely.

Natalie L. Winslow

akerman.com



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